

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION,  
OPIATE LITIGATION**

**MDL NO. 2804**

**Case No. 17-MD-2804**

**THIS DOCUMENT RELATES TO:**

**Judge Dan Aaron Polster**

*Salmons v. Purdue Pharma L.P., et al.*  
MDL Case #1:18-OP-45268;

*Artz v. Endo Health Solutions Inc., et al.*  
MDL Case # 1:19-OP-45459

*Doyle v. Purdue Pharma L.P., et al.*  
MDL Case No. #1:18-op-46327

**JOINT MOTION FOR EXTENSION OF TIME**

Pursuant to Federal Rule of Civil Procedure 6(b), Counsel for NAS Plaintiffs and Defendants<sup>1</sup> in the above-captioned cases move as follows:

Plaintiffs have granted Defendants an extension from February 21, 2020, to February 26, 2020, to designate their experts and provide reports to Plaintiffs' Counsel. The parties have further agreed that, for their mutual convenience and based on the availability of some defense experts, Defendants shall have an extension from April 1, 2020, to April 8, 2020, to present their expert witnesses for deposition. The final expert deposition is currently scheduled for April 8, 2020.

Given the above-mentioned extensions related to experts, the parties respectfully request that their briefing schedule be slightly extended to allow information from the expert depositions to be incorporated, with the following dates in effect:

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<sup>1</sup> Several defendants named in this litigation are not subject to personal jurisdiction in this matter. This joint motion is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

1. Defendants' deadline to file their opposition to Plaintiffs' motion to certify a class will be extended from April 1, 2020 to April 10, 2020.
2. Plaintiffs' deadline for filing a reply to Defendants' opposition to Plaintiffs' motion to certify class will be extended from April 30, 2020, to May 18, 2020.

NAS Plaintiffs and Defendants respectfully request that, for good cause shown, this Court extend the deadlines as outlined herein.

DATED: March 5, 2020.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on March 5, 2020 a true and correct copy of the foregoing was automatically served on the parties registered with the Court's CM/ECF system.

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